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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

WADE ALLEN, individually, and on behalf of  
all others similarly situated,

Plaintiff,

vs.

BARRICK GOLD OF NORTH AMERICA,  
INC. d/b/a NEVADA GOLD MINES LLC; and  
TURNER STAFFING GROUP, LLC,

Defendants.

Case No.: 3:24-cv-00231-CLB

**ORDER GRANTING STIPULATION  
TO STAY CASE PENDING MOTION  
FOR PRELIMINARY APPROVAL OF  
SETTLEMENT**

Plaintiff WADE ALLEN (“Plaintiff”), by and through his counsel of record, the law firms of Brown, LLC and Roger Wenthe, PLLC, and Defendant TURNER STAFFING GROUP, LLC (“Turner” or “Defendant”), by and through its counsel of record, the law firm of Jackson Lewis P.C., Defendant NEVADA GOLD MINES LLC (erroneously sued as Barrick Gold of North America, Inc d/b/a Nevada Gold Mines LLC) (“NGM”), by and through their counsel, the law firm of Simons Hall Johnston PC, hereby notify the Court that they have reached a settlement in principle of this action, and stipulate and agree to continue the stay of this case to **May 22, 2025**, pending the filing of a motion for preliminary settlement approval, based on the following:

1. This case is a putative collective action under the Fair Labor Standards Act and putative class action under FRCP 23.

2. On September 13, 2024, the parties submitted a stipulation to stay this case until January 3, 2025, to engage in mediation. ECF No. 19.

3. On September 16, 2024, the Court approved the parties’ stipulation and ordered the case stayed until January 3, 2025. ECF No. 20.

1           4.       The parties participated in an initial mediation session with Hon. Peggy A. Leen  
2 (Ret.) at JAMS on December 18, 2024, but did not reach a settlement.

3           5.       On January 6, 2025, the Court approved the parties' stipulation to continue the stay  
4 of this case until March 28, 2025, pending a second mediation session with Judge Leen in mid-to-  
5 late March 2025. ECF No. 24.

6           6.       The parties held the second mediation session on March 6, 2025, and are pleased to  
7 report that they have reached a settlement in principle for a collective and class action settlement  
8 that will be subject to this Court's preliminary and final approval under Rule 23(e) of the Federal  
9 Rules of Civil Procedure.

10          7.       The parties are in the process of finalizing the long-form settlement agreement and  
11 exhibits, determining the allocation of settlement funds amongst putative collective and class  
12 members, selecting a settlement administrator, and preparing the motion for preliminary approval,  
13 which they expect to file by May 22, 2025.

14          8.       Accordingly, the parties have stipulated to, and request that this Court issue an order  
15 continuing the stay of this case until May 22, 2025.

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1 DATED this 22<sup>nd</sup> day of April, 2025.

2 BROWN, LLC

JACKSON LEWIS P.C.

3 /s/ Nicholas Conlon

/s/ Joshua A. Sliker

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14 *Wade Allen*

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*Attorneys for Defendant*

*Nevada Gold Mines LLC*

15 **IT IS SO ORDERED.**

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17 UNITED STATES MAGISTRATE JUDGE

18 DATED: April 22, 2025